

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

GEORGE McCALL)	CASE NO.
)	
Plaintiff,)	JUDGE
)	
v.)	
)	
U.S. DEPARTMENT HOMELAND)	
SECURITY CLAIMS MANAGEMENT)	
BRANCH,)	
)	<u>NOTICE OF REMOVAL</u>
Defendant.)	

Now comes Defendant, U.S. Department of Homeland Security, Claims Management Branch (“TSA”), by and through Bridget M. Brennan, Acting United States Attorney for the Northern District of Ohio, and Lisa Hammond Johnson, Assistant United States Attorney, and respectfully states as follows:

1. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1441, 1442, and 1446, for disposition of Plaintiff’s claims against Defendant, which are set forth in Cleveland Municipal Court Case No. 2020 CVF 3032, captioned *George McCall v. U.S. Dep’t Homeland Security Claims Management Branch*. (A copy of the Summons and Complaint are attached hereto as Exhibit A.)

2. Defendant first received notice of the Complaint on March 31, 2021, and thirty days have not expired since receipt by the Defendant of a copy of the initial pleading setting forth the

claim for relief upon which this proceeding is based.

3. Plaintiff's Complaint alleges claims against a federal agency of the United States. Thus, this action may be removed to the United States District Court for the Northern District of Ohio for disposition, pursuant to 28 U.S.C. § 1442(a)(1).

4. This Notice of Removal is being filed on April 30, 2021. This notice is thus timely and proper in accordance with the provisions of 28 U.S.C. § 1446(b).

5. A copy of this notice will promptly be served on all adverse parties and filed with the Clerk of Court for the Cleveland Municipal Court pursuant to 28 U.S.C. § 1446(d).

WHEREFORE, the Defendant prays that the above-captioned action, pending in the Cleveland Municipal Court, be removed to this Court.

Respectfully submitted,

BRIDGET M. BRENNAN
Acting United States Attorney

By: /s/ Lisa Hammond Johnson
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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of April, 2021, a copy of the foregoing *Notice of Removal* was filed electronically. Notice of this filing will be served upon all parties by operation of the Court's electronic filing system.

/s/ Lisa Hammond Johnson
Lisa Hammond Johnson
Assistant United States Attorney